

**IN UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA)	CASE NO.: 1:19-cr-00544-DCN
)	
)	JUDGE: DONALD C. NUGENT
)	
vs.)	
)	
)	
EDWIN ORIN)	

SENTENCING MEMORANDUM

Now comes Defendant, Edwin Orin, by and through his undersigned counsel, Catherine Meehan of Patituce & Associates, LLC., who hereby submits this Sentencing Memorandum setting forth factors for the Court's consideration in determining an appropriate sentence that is sufficient but not greater than necessary to comply with the statutory directives set forth in 18 U.S.C. 3553(a).

The overriding purposes of sentencing are to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; to afford adequate deterrence to criminal conduct; to protect the public from further crimes of the defendant; and to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner. 18 U.S.C. 3553(a)(2).

In this case, the purposes of 18 U.S.C 3553 will be served by imposing a sentence based on the plea agreement. Because the applicable guidelines range is in Zone A, imprisonment is not required. This Honorable Court should consider the imposition of the minimum sentence necessary to achieve the goals of sentencing and provide just punishment for the offense. A sentence of probation will adequately deter future criminal conduct as well as protect the public from suffering future harm.

Defendant has numerous mitigating factors that support a sentence of probation. Defendant acknowledges that he made a mistake, regrets his actions, and is deeply remorseful for his conduct. Defendant feels ashamed that he has made a bad name for his wife and family and is ready to move forward to not only be better for himself, but for his family. Defendant recognizes the gravity of his behavior and the impact it has had on his family and society.

Defendant is a veteran of the United States Air Force. He was honorably discharged after serving this country for nine years. His conduct in this case stems from utilizing his interpretation of overtime production that was incorrect, and self-serving. Defendant recognizes that his conduct was wrong, and as a result, he was overcompensated for actual work performed. He has clearly expressed acceptance of responsibility in his written statement during the presentence investigation in this case. Defendant intends to use this mishap as a learning experience to grow and help others from taking similar action in the future. In the end, Defendant's actions are out of character, and he is willing to do whatever is necessary to remedy his wrongs. Further, outside of the conduct in this case, Defendant has lived a law-abiding life and has never been convicted of a crime, nor has he had any other involvement in criminal activity.

Defendant's respect and love for his family has driven him to make better decisions. His ultimate goal is to create a good life for himself and his family. He has taken full responsibility of his actions and is truly remorseful for his involvement in this case. Defendant is in no way a threat to society, as he has lived a law-abiding life outside of this case. A term of probation would give Defendant an opportunity to be adequately punished for his conduct but would also allow him the opportunity to continue to grow and take positive steps toward being the best father, husband, and member of the community that he can be.

WHEREFORE, for the reasons set forth herein, and after hearing from the Defendant at the time of sentencing, Defendant prays this Honorable Court issue a just punishment not greater than necessary in this case and impose a term of probation, which is consistent with the guidelines and plea agreement in this case.

Respectfully submitted,

/s/Catherine Meehan

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Sentencing Memorandum has been forwarded to all parties via the clerk's office electronic filing on the 20th day of January 2020.

/s/ Catherine R. Meehan
Catherine R. Meehan (#088275)
Attorney for Defendant